

TO: Mail Stop 8 Director of the U.S. Patent & Trademark Office P.O. Box 1450 Alexandria, VA 22313-1450	REPORT ON THE FILING OR DETERMINATION OF AN ACTION REGARDING A PATENT OR TRADEMARK
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In Compliance with 35 § 290 and/or 15 U.S.C. § 1116 you are hereby advised that a court action has been
 filed in the U.S. District Court Northern District of California on the following ☒ Patents or ☐ Trademarks:

DOCKET NO. CV 07-06434 RS	DATE FILED 12/21/2007	U.S. DISTRICT COURT 280 South First Street, San Jose, CA 95113
PLAINTIFF SYNAPTICS INC		DEFENDANT ELANTECH DEVICES CORP.

PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
1 7,109,478		SEE ATTACHED COMPLAINT
2		
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4		
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In the above—entitled case, the following patent(s) have been included:

DATE INCLUDED	INCLUDED BY
	<input type="checkbox"/> Amendment <input type="checkbox"/> Answer <input type="checkbox"/> Cross Bill <input type="checkbox"/> Other Pleading

PATENT OR TRADEMARK NO.	DATE OF PATENT OR TRADEMARK	HOLDER OF PATENT OR TRADEMARK
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In the above—entitled case, the following decision has been rendered or judgement issued:

DECISION/JUDGEMENT

CLERK Richard W. Wicking	(BY) DEPUTY CLERK Betty Walton	DATE December 27, 2007
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Copy 1—Upon initiation of action, mail this copy to Commissioner Copy 3—Upon termination of action, mail this copy to Commissioner
 Copy 2—Upon filing document adding patent(s), mail this copy to Commissioner Copy 4—Case file copy

COPY

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

CV 07

6434

SYNAPTICS INCORPORATED, a Delaware
corporation,

Plaintiff,

v.

ELANTECH DEVICES CORP., a corporation
existing under the laws of Taiwan, R.O.C.,

Defendants.

Case No.

**COMPLAINT FOR PATENT
INFRINGEMENT**

DEMAND FOR JURY TRIAL

Plaintiff Synaptics Incorporated ("Synaptics"), by and through its undersigned attorneys,
hereby complains against Defendant Elantech Devices Corp. ("Elantech"), and alleges as follows:

NATURE OF THE ACTION

1. This is a civil action for infringement of United States Patent No. 7,109,978 ("the
'978 patent"), brought pursuant to the United States patent laws, 35 U.S.C. § 271 *et seq.*

PARTIES

2. Plaintiff Synaptics is a corporation organized under the laws of the State of
Delaware and has its principal place of business at 3120 Scott Blvd., Suite 130, Santa Clara,
California 95054.

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CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

RS

1 10. At least as early as October 2006, Elantech was on notice of its infringement of the
2 '978 patent. By June, 2007, Synaptics had explained to Elantech in detail how Elantech was
3 infringing the '978 Patent.

4 11. Elantech conducts its activities with respect to electronic products including touch
5 pads, touch sensing, or pointing devices, with knowledge and intending that third parties will use
6 their respective United States contacts and distribution channels to import into, sell, offer for sale,
7 and/or use these products in California and/or elsewhere in the United States. On information and
8 belief, Elantech has used such products in California and/or elsewhere in the United States.

9 **CLAIM FOR RELIEF**

10 **(Patent Infringement Of The '978 Patent Claims)**

11 12. Synaptics reasserts and realleges the averments contained in paragraphs 1-11
12 above, as if fully set forth herein.

13 13. Elantech has infringed and induced infringement of one or more claims of the '978
14 patent.

15 14. Synaptics has no adequate remedy at law. Elantech's acts of infringement and
16 inducement of infringement of the '978 patent, have caused and will continue to cause Synaptics
17 irreparable harm unless Elantech is enjoined by the Court.

18 15. Elantech's acts of infringement and inducement of infringement of the '978 patent
19 have been and continue to be willful, wanton, deliberate, and with knowledge and awareness of
20 the '978 patent.

21 **PRAYER FOR RELIEF**

22 WHEREFORE, Plaintiff Synaptics prays for the following relief against Elantech as
23 follows:

24 (a) Adjudge and decree that Elantech has infringed and induced infringement of the
25 '978 patent;

26 (b) Preliminarily and permanently enjoin Elantech, their officers, directors,
27 employees, agents, servants, successors and assigns, and any and all persons and entities acting in
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1 privity or concert with them from further infringement, inducement of infringement, and/or
2 contributory infringement of the '978 patent;

3 (c) Award Synaptics damages in an amount adequate to compensate Synaptics for
4 Elantech's infringement and inducement of infringement of the '978 patent, but in no event less
5 than a reasonable royalty under 35 U.S.C. § 284;

6 (d) Award Synaptics increased damages, pursuant to 35 U.S.C. § 284, in an amount
7 not less than three times the amount of actual damages awarded to Synaptics, by reason of
8 Defendants' willful infringement of the '978 patent;

9 (e) Award Synaptics interest on damages awarded and its costs pursuant to 35 U.S.C.
10 § 284;

11 (f) Declare this an exceptional case, with respect to the patent infringement claims,
12 and award Synaptics its reasonable attorneys' fees and costs pursuant to 35 U.S.C. § 285;

13 (g) Award Synaptics prejudgment interest; and

14 (h) Award such other relief as the Court may deem just and proper.

15 **DEMAND FOR JURY TRIAL**

16 Plaintiff demands a trial by jury of any and all issues triable of right by a jury in the
17 above-captioned action.

18 **CERTIFICATION OF INTERESTED ENTITIES OR PERSONS**

19 Pursuant to Civil L.R. 3-16, the undersigned certifies that, as of this date, Elan
20 Microelectronics Corp., apparently a Taiwanese company, may be "non-party interested entities,"
21 under the provisions of Civil L.R. 3-16. There is no other such interest to report.

22 Dated: December 21, 2007

KARL J. KRAMER
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MORRISON & FOERSTER LLP

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25 By: 

Karl J. Kramer

26 Attorneys for Plaintiff
27 SYNAPTICS INCORPORATED
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